

Exhibit 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

BRIAN HUDDLESTON,

Plaintiff,

vs.

**FEDERAL BUREAU OF
INVESTIGATION and UNITED STATES
DEPARTMENT OF JUSTICE**

Defendant

Case No. 4:20-cv-447-ALM

DECLARATION OF TY CLEVINGER

My name is Ty Clevenger, I am greater than 18 years of age and competent to testify, and I do testify as follows under penalty of perjury under the laws of the United States, as witnessed by my signature below:

- (1) I am the attorney representing Brian Huddleston in the case identified above.
- (2) The information in my April 25, 2022 declaration (Dkt. 52-1) is true and correct.
- (3) Since April 25, 2022 I have accrued additional fees representing Mr. Huddleston, and a true and correct invoice reflecting those fees is attached to this declaration.
- (4) Based on the information set forth in my April 25, 2022 declaration, I believe \$500 per hour is a reasonable rate given my level of experience, and I believe \$115,581.65 is a reasonable charge for my total services thus far.

THE DECLARANT SAYS NOTHING FURTHER.

February 2, 2023


Ty Clevenger

Ty Clevenger
 212 S. Oxford Street #7D
 Brooklyn, New York 11219
tyclevenger@yahoo.com

INVOICE

February 2, 2023

Date	Time	Expense	Purpose
		\$55,331.65	Unpaid invoice from April 25, 2023
5/5/2022	0.5		Legal research on attorney eyes only
5/6/2022	1.7		Additional research; draft and file opposition to in camera motion
5/7/2022	0.4		Amend and file opposition to in camera motion
5/17/2022	1.1		Review reply; legal research
5/18/2022	5.1		Legal research; start drafting sur-reply
5/19/2022	5.9		Draft sur-reply; additional research
5/20/2022	7		Review the record and look for inconsistencies; draft sur-reply; legal research
5/21/2022	7.9		Review the record and look for inconsistencies; draft sur-reply; legal research
9/29/2022	1.3		Review order and discuss w/ E. Quainton
9/30/2022	2.2		Review order; research for motion to reconsider
10/27/2022	1.7		Review court order; discuss w/ L. Beech, et al.; review record; correspond w/ A. Parker
10/29/2022	0.4		Correspond w/ A. Parker & other parties re inconsistencies in FBI motion
11/2/2022	1.4		Review record for response to motion; email correspondence
11/4/2022	1.6		Legal research on 7(D) exemption
11/7/2022	1.5		Research and draft response to reconsideration; research on refusal to search email
11/8/2022	2.2		Research and draft response to reconsideration; email A. Parker
11/9/2022	8.5		Review record; more research; email A. Parker; work on our motion to clarify
11/10/2022	1.4		Finish and file response to motion for reconsideration
11/13/2022	3.3		Review record for inconsistencies; email team about inconsistencies; work on motion to clarify
11/14/2022	1.7		Finish and file motion to clarify; confer w/ A. Parker; work on JSR & draft order
11/15/2022	0.3		Confer re joint status report
11/30/2022	0.4		Confer w/ opposing counsel and client re extension of time
12/8/2022	0.3		Confer w/ opposing counsel about in camera motion

12/9/2022	1.1	Review latest filings by FBI; cross-reference records already produced
12/16/2022	0.4	Draft and file motion for extension
12/17/2022	1.9	Review records; email exchanges w/ others familiar w/ S. Rich
12/19/2022	0.9	Respond to info from E. Tilton; correspond w/ E. Quainton and A. Parker
12/20/2022	0.3	Review potential new evidence; correspond w/ E. Quainton
12/21/2022	0.3	Discussion w/ E. Quainton, plans to join case
12/26/2022	5.5	Legal research; work on surreply re personal laptop
12/27/2022	4.9	Legal research; work on surreply and motion to permit AEO
12/28/2022	4.2	Legal research; work on surreply to personal laptop and reply to work laptop
12/29/2022	1.9	Legal research; confer w/ A. Parker; confer w/ E. Quainton; motion for extension and other relief
12/30/2022	0.4	Legal research on exemptions / illegal activity
1/10/2023	0.2	Draft and send correspondence to A. Parker re outstanding matters
1/11/2023	6.4	Legal research; draft reply to motion to clarify
1/12/2023	9.8	Update and continue drafting surreply; draft response to motion to clarify; legal research
1/13/2023	11.9	Confer w/ E. Quainton; legal research; finalize and file motion to view evidence as well as reply and surreply
1/18/2023	6	Review AEO motion; draft and file notice re error
1/27/2023	2.5	Legal research re Defendants supplemental MSJ; draft motion for fees
1/28/2023	3.1	Additional research re MSJ; draft motion for fees
2/2/2023	1	Email / call A. Parker; finalize motion for fees, incorporate E. Quainton figures
5/5/2022	0.5	Legal research on attorney eyes only
5/6/2022	1.7	Additional research; draft and file opposition to in camera motion
5/7/2022	0.4	Amend and file opposition to in camera motion
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Total	120.5	\$55,331.65	
	120.5x500=	\$60,250.00	
Grand Total		\$115,581.65	